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July 22, 2025

VIA ECF

Hon. Philip M. Halpern
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, NY 10601

Stein v. Town of Greenburgh, et al., 21-cv-05673 (PMH)

Your Honor:

We represent the Plaintiff, Kristin Stein, in this matter. We write to follow up the discussion had during the parties' July 15, 2025 conference with the Court and the correspondence filed by Mr. Flannery, counsel to Defendants, yesterday.

It was our understanding of the Court's instructions during the conference that Defendants were to make a reasonable, good faith offer in response to Plaintiff's most recent settlement demand and that the Court then expected Plaintiff to respond to that offer with a reasonable counter. The Court could then assess whether further settlement discussions and a referral to a Magistrate would be productive.

Unfortunately, though perhaps unintentionally, Mr. Flannery's July 21 letter suggests that such an offer was made but that a referral for further negotiation would not be fruitful. The impression created is that the Plaintiff has failed to respond reasonably to an offer from the Defendants. So that there is no misunderstanding, the Court should be aware that Defendants' "response" to the Plaintiff following last week's conference was merely to reiterate their refusal to make *any* monetary offer at all.

Respectfully,


James Castro-Blanco

JCB/ws